



TUDOR

Modern Slavery and Human Trafficking Statement

This statement is made on behalf of Tudor Capital Europe LLP (the “LLP”). The LLP takes its obligations in relation to identifying, reporting and preventing slavery and human trafficking very seriously and has a zero tolerance approach to abuses of human rights. As a responsible business, the LLP is committed to taking appropriate steps to ensure that slavery and human trafficking does not occur within any part of its business or supply chains.

The LLP is an alternative investment asset manager with non-UK affiliates in the USA, Singapore and Australia (collectively “Tudor”). Tudor does not deal in physical goods or manufactured items which are the activities involving the highest risk of slavery or human trafficking. Nevertheless, the LLP acknowledges that it needs to remain vigilant when conducting business and this Statement affirms the LLP’s intention to act ethically in its business relationships.

The LLP operates a number of policies and processes that assist in the prevention of slavery and human trafficking in its operations:


- **Global Whistleblowing Policy:** Tudor encourages all of its employees, members, clients and other business partners to report any concerns related to our direct activities and our supply chains without fear of retaliation.
- **Tudor Group Code of Ethics:** Tudor strives to maintain the highest standards of conduct and ethical behaviour in its operations, including managing its supply chain.
- **Modern Slavery and Human Trafficking Training:** All employees and members are provided training annually.
- **Recruitment process:** All of Tudor’s personnel are vetted prior to commencing work and are required to provide evidence of their eligibility to work in the UK.
- **Due Diligence process:** The LLP takes various factors into consideration before partnering with a new supplier or continuing business relationships with existing suppliers. These include the LLP (i) requesting that new suppliers provide the LLP with their policies and procedures on the prevention of slavery and human trafficking in its operations; and (ii) periodically reviewing existing suppliers for their continued compliance.

The LLP judges the effectiveness of its policies and processes via the number of reports it receives from employees, members and third parties, including the general public and law enforcement agencies. If no such reports are received, the procedures are deemed to be performing adequately.

The LLP has also made relevant personnel aware of the LLP’s position on modern slavery and human trafficking as well as the requirements of section 54(1) of the Modern Slavery Act 2015.

This statement was approved on 19 May 2022 by the LLP’s members and is made pursuant to section 54(1) of the Modern Slavery Act 2015. This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022.

Signed by Ben Kitchener – Designated Member



For and on behalf of the members of Tudor Capital Europe LLP